Harmonization and Update effort for MAH, MAMF and MALB Measurement Standards

Continuous maintenance efforts to improve these standards are currently ongoing.



MAH Updates 3/22 Read me

These proposed revisions address related certification or listing programs and personnel. The proposed revisions are applicable to the following ANSI/AARST publications:

– MAH 2019 (measurement in homes)

Latest published versions of those standards are available for comparison at <u>www.standards.aarst.org</u> where all ANSI/AARST standards can be found for review at no charge and for purchase.

The current mitigation standards committee roster (consensus body) can be linked to from <u>www.standards.aarst.org/public-review</u>. The current work project includes (1) harmonization, where possible, for all portions of these documents to read the same for the same tasks; (2) update based on new experiences, and (3) renderings that are more conductive to stakeholders who are involved in compliance assessment.

Public Review: MAH Updates 3-22 COMMENT DEADLINE: May 23rd, 2022

REQUESTED PROCESS AND FORM FOR FORMAL PUBLIC REVIEW COMMENTS

Submittals (MS Word preferred) may be attached by email to StandardsAssist@gmail.com

1) Do not submit marked-up or highlighted copies of the entire document.

2) If a new provision is proposed, text of the proposed provision must be submitted in writing. If modification of a provision is proposed, the proposed text must be submitted utilizing the strikeout/underline format.

3) For substantiating statements: Be brief. Provide abstract of lengthy substantiation. (If appropriate, full text may be enclosed for project committee reference.)

REQUESTED FORMAT

Title of Public Review Draft: MAH Updates 3-22

• Name:

Affiliation:

- Clause or Subclause:
- Comment/Recommendation:
- Substantiating Statements:

• [___] Check here if your comment is supportive in nature and does not require substantive changes in the current proposal in order to resolve your comment.

Repeat the five bullet items above for <u>each</u> comment.

Requested registration of your contact information and copyright release.

ONE TIME REGISTRATION CONTACT INFORMATION AND COPYRIGHT RELEASE

NOTE: AARST Consortium on National Radon Standards encourages original commentary on its standards. Commenters that choose to submit comments without an author's signature (due to difficulties in timeliness, proximity or other) shall be deemed to have done so at their sole discretion and have thereby acknowledged and accepted the copyright release herein. If commenters submit comments authored by others, those comments must also be accompanied by a signed copyright release from the author of the original comment. The original comment author and representing commenters may be asked to engage in dialog supporting their position.

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PLEASE SHIP TO: <u>StandardsAssist@gmail.com</u> Commenters are responsible for informing the standards assistant staff a when changing contact information or other preferences.

Notice regarding unresolved objections: While each committee seeks to resolve objections, please notify the committee responsible for an action or inaction if you desire to recirculate any unresolved objections to the committee for further consideration. Notice of right to appeal. (See Bylaws for the AARST Consortium on National Radon Standards - Operating Procedures for Appeals available at www.radonstandards.us, Standards Forum, Bylaws): (2.1) Persons or representatives who have materially affected interests and who have been or will be adversely affected by any substantive or procedural action or inaction by AARST Consortium on National Radon Standards committee(s), committee participant(s), or AARST have the right to appeal; (3.1) Appeals shall first be directed to the committee responsible for the action or inaction.

AARST Consortium on National Radon Standards

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The Consortium Consensus Process

The consensus process developed for the AARST Consortium on National Radon Standards and as accredited to meet essential requirements for American National Standards by the American National Standards Institute (ANSI) has been applied throughout the process of approving this document.

Continuous Maintenance

This standard is under continuous maintenance by the AARST Consortium on National Radon Standards for which the Executive Stakeholder Committee has established a documented program for regular publication of addenda or revisions, including procedures for timely, documented, consensus action on requests for change to any part of the standard.

User Tools: User tools are posted online (<u>www.standards.aarst.org/public-review</u>) as they become available (such as templates for field notices, inspection forms, interpretations and approved addenda updates across time).

Notices

Notice of right to appeal: Bylaws for the AARST Consortium on National Radon Standards are available at <u>www.standards.aarst.org/public-review</u>. Section 2.1 of Operating Procedures for Appeals (Appendix B) states, "Persons or representatives who have materially affected interests and who have been or will be adversely affected by any substantive or procedural action or inaction by AARST Consortium on National Radon Standards committee(s), committee participant(s), or AARST have the right to appeal; (3.1) Appeals shall first be directed to the committee responsible for the action or inaction."

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MAH Protocol for Conducting Measurements of Radon and Radon Decay Products in Homes



Proposed Maintenance Updates for MAH 03/22

Commentary/Rationale: The proposed revision to Section 2.3.1 is to align with ANSI Essential Requirements 2021 when personal or product certifications (or listings) are required by a standard.

2.3 Testing Devices

2.3.1 Approved test devices required

All test devices used for determining if *mitigation* is warranted are to be listed by one of the following authorities for having proven to meet minimum quality requirements:

- as established by the National Radon Proficiency Program (NRPP), the National Radon Safety Board (NRSB) or a program that verifies device compliance with the latest publication of ANSI/AARST MS-<u>PC</u>; or
- b) as required by local statutes for jurisdictions that have a program for evaluating and approving devices.

Note—Minimum requirements for test device accuracy are published in ANSI/AARST MS-PC "Performance Specifications for Instrumentation Systems Designed to Measure Radon Gas in Air."

Commentary/Rationale: The proposed revision to Section 8.1 recognizes multiple layers of training and credentials that may exist for differing proficiency programs and jurisdictions of authority

8.1 Qualified Measurement Services

To be considered qualified for conducting measurement services in homes: The person(s) or team, regardless of business organizational structure, shall operate under a *quality assurance* plan that includes the following requirements for quality of personnel and practices:

- a) Operations shall be conducted under the responsible charge of a *qualified measurement professional*;
- b) <u>Individuals who place and retrieve radon measurement devices shall be qualified for their</u> apportioned task, as permitted by statute, state licensure or certification program; and
- c) Individuals deemed qualified to place, retrieve or <u>and</u> analyze data obtained from radon measurement devices shall be *qualified measurement professionals*.

Commentary/Rationale: The proposed revision to Section 8.1.1 is to align with ANSI Essential Requirements 2021 when personal or product certifications or listings are required by a standard.

8.1.1 Qualified Measurement Professionals (definition)

A "Qualified Radon Measurement Professional" is defined as: "An individual who has demonstrated a minimum degree of appropriate technical knowledge and skills <u>sufficient to place</u>, retrieve and analyze (as <u>applicable</u>) radon detectors and to <u>implement quality procedures when conducting radon measurements</u> in homes:

- a) as established by *certification requirements*¹ of the National Radon Proficiency Program (NRPP), or the National Radon Safety Board (NRSB), or *equivalent national program*²; and/ or
- b) as required by statute, state licensure or certification program, where applicable, for licensure or certification programs that evaluate individuals for radon-specific technical knowledge and skills."

Commentary/Rationale: These proposed additions to Section 14 (Description of terms) are to elaborate on what is meant by the term "equivalent programs" as compared to the benchmark established for 25 years by the two competing national programs identified in Section 3.

Section 14 Description of terms

- **Equivalent National Program:** A national program that evaluates and lists qualified individuals, training courses and other products or services, such as laboratory services, integral to achieving public health goals intended by this standard. Equivalent programs are programs with published policies that:
 - (1) require persons to undergo education and an impartial examination process prior to granting personal certification or certificates of educational achievement;
 - (2) have a written policy and means for receiving and adjudicating complaints against individuals who have been granted the credential; and
 - (3) require surveillance of continued competence, not less than as demonstrated by continuing education in related technical knowledge and skills, prior to granting recertification or renewed certificates.

Commentary/Rationale: The proposed additions for certification and listing requirements are to elaborate on minimum educational requirements as historically associated with the two competing national programs identified in Section 3.

Note—Where certification or listing programs are pending and are not active when this standard is published, these definitions will be modified prior to publishing.

<u>Certification Requirements (Qualified Radon Measurement Professional-Homes)</u>: Certifications granted by <u>equivalent national programs that qualify individuals as proficient in conducting and analyzing radon</u> measurements in existing homes include 16 hours or more education prior to granting both certification and biennial recertification on tasks required in ANSI/AARST MAH Protocol for Conducting Measurements of Radon <u>and Radon Decay Products in Homes.</u>

¹ The definition of "certification requirements" is located Section 14, *Description of Terms*. The definition includes minimum educational requirements associated with listing or certification of qualified mitigation professionals.

² Note that identification of the two competing certification bodies listed is not an endorsement of either program. The definition of "equivalent national program" is located Section 14, Description of Terms.